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Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

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Refer to: Johns-Manville Disposal Area, Waukegan, Illinois
Lake County/L0971900014
Superfund/Technical Reports

November 18, 1986

Mr. Brad Bradley
Remedial Project Manager
CERCLA Enforcement Section
USEPA, Region V, 5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Brad:

Please find attached my comments on the draft final FS Report for the Johns-Manville site which was received on November 12, 1986. I have limited my comments to those contradicting previous requested changes by USEPA/IEPA or points I feel the public would be confused by without clarification. Additionally, I would like to see JM's groundwater monitoring program briefly expanded upon in this final report as it is the key control in evaluating the success of the proposed remedial action.

Thank you for your consideration of these concerns.

Sincerely,

Kurt D. Neibergall, E.I.T.
Federal Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KN:rd0669g/69

Attachment

cc: Bob Cowles, IEPA
Don Gimbel, IEPA
Division File

Johns-Manville Site
Lake County/L0971900014
Superfund/Technical Reports

JOHNS-MANVILLE DISPOSAL AREA - WAUKEGAN, ILLINOIS 11/17/86
IEPA COMMENTS ON DRAFT FINAL FS REPORT

Sect. 1.4, P. 1-4 - First Paragraph - Point out that on-site work does not require permits from RCRA - be consistent with goals of program.

Sect. 1.5, P. 1-4 - First paragraph - Statement made that recommended alternative is "considered acceptable" by community - but public comment period has not been implemented.

Sect. 2.2.5, P. 2-12 - End of second paragraph; Air detection units appear to be wrong Fibers/ML → Fibers/c.c. (same unit error on P. 2-14, 3rd paragraph). Third Paragraph - correctly reference Division of Air Pollution Control, IEPA.

Sect. 2.2.6, P. 2-14 - Fourth Paragraph - Statement about "carcinogenic or other effects" from ingestion of asbestos fibers - questionable?

Sect. 2.3, P. 2-16 - First Paragraph - No release observed during limited RI sampling? P. 2-17 - Second Paragraph - Dilution/dispersion of lead contamination by flowing groundwater is no excuse to ignore this potential problem. Last Paragraph - Subsurface soil below the water table appears not to be a contamination source based on limited RI sampling work.

Sect. 3.1, P. 3-1 - On-site treatment/stabilization was not mentioned in the executive summary.

Sect. 3.2.1, P. 3-5 - Here, and in many instances following - riprap thickness is alluded to as 8-12" instead of the specified 12" thick - and bedding is only mentioned in the appendix remedial action estimates.

Sect. 3.2.3, P. 3-7 - Again, on-site remediation would not require permits. Also on P. 3-8.

Sect. 3.4.1, P. 3-12 - First paragraph - appears to contradict earlier reference /statement that asbestos can be carcinogenic to humans. Second Paragraph - Groundwater and surface water appear not to be contaminated based on limited RI sampling.

Sect. 4.1, P. 4-2 - First Paragraph - Groundwater and surface water monitored to detect (not assure) if water quality is degraded.

*Sect. 4.1.1.1, P. 4-2 - This is the most print devoted to groundwater monitoring in the report - and should be expanded upon - minimum of 7 new wells stipulated - the three wells on the eastern side should not be east of eastern site boundary - but immediately adjacent (within 25') of miscellaneous disposal area dike toe - also state that they would be nested to monitor the top and bottom of the sand aquifer under the disposal area - I would therefore

recommend two nested pairs beside the miscellaneous pit, one nested pair further north along the south end of the sludge disposal basin system and then two shallow wells along the north side of the industrial canal (this is one more well than 7 proposed in October meeting) - but this would start to address potential problem of heavier contaminants moving predominantly easterly - as well as lighter solvents sampled for before dilution effects from dynamic hydrogeological setting under current monitoring network.

KMA states a minimum of 8 wells would be monitored - consistent; when include the background well west of site - have 9 wells (do not sample current 3 east wells or south well which appears to be upgradient from the site) *also, somewhere, possibly in this section, a contingency plan should be alluded to, to outline a course of action should contamination be migrating.

Sect. 4.2.1.2, P. 4-4 - Should allude to repair of berm in northeast corner of miscellaneous disposal pit as outlined in USEPA stipulations. This is unclear on top of P. 4-5.

Sect. 4.3.1.1, P. 4-8 - This is the first time in this report that thickness of cover soil is defined to include the 3" of topsoil dressing. Is this consistent with USEPA interpretation of cover soil thickness - the 3" layer is loosely placed and only provides a media for vegetation - minimal freeze/thaw protection?

Sect. 4.5.1.1, P. 4-12 - States that trees/stumps transported off-site for disposal - contradicts previous statement of burial or burning (latter preferred in previous state comments) on-site.

Sect. 5.1.3, P. 5-4 - Second Full Paragraph - Permits for on-site work again alluded to.

Sect. 5.2, P. 5-7 - Last Paragraph - State landfill closure guidelines exceed requirements above in many aspects. More appropriate language; "requirements are compatable with those above for specific site conditions".

Sect. 5.2.1.6, P. 5-9 - Community interest to date has been minimal. "Virturally none" is a controversial description.

Sect. 5.3.1, P. 5-12 - Last paragraph of section; lead levels in groundwater were less than health standard based on limited RI sampling. No visible emissions of asbestos observed during RI work. *Second to Last Paragraph - Relevant asbestos standard - what about OSHA workers 8 hr. TWA?

Sect. 5.3.2, P. 5-12 - First Paragraph - Relevant air and groundwater standards appear to be met based on limited RI sampling.

Sect. 5.4.1, P. 5-15 - First Paragraph - Again lead/asbestos wastes appear to have not degraded quality of environment.

Sect. 6.2, P. 6-4 - No. 3. It seems that here, or in a previous section the benefit of the increased soil cover depth with regards to freeze/thaw protection should be stated. Every time this alternative is mentioned, only increased groundwater protection is given as the minor reason to consider this option. *I believe this point would be confusing to the public and should be consistently explained in the FS report or the addendum by USEPA.

Appendix A. P. A-1-14 - For Annual Operation and Maintenance Costs - No capital costs are included for the installation of the proposed detection groundwater monitoring network.

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